Storm Water Pollution Prevention Plan

Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Williamsburg, Michigan 48960

Prepared for:
Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Williamsburg, Michigan 48690

Prepared By:
INLAND SEAS ENGINEERING, INC.
1755 Barlow Street
P.O. Box 6820
Traverse City, MI 49696-6820
231.933.4041
231.933.4393 (fax)

TABLE OF CONTENTS

Williamsburg Receiving and Storage, LLC.
Storm Water Pollution Prevention Plan
10190 Munro Road
Willamsburg, MI 48690

GENERAL FACILITY INFORMATION

Name of Facility: Williamsburg Receiving and Storage Holdings, LLC.
Facility Address: 10190 Munro Road
Williamsburg, Michigan 48690

Facility Contact:
Name: Mr. Christopher Hubbell
Title: President
Telephone: 231.264.5260
Mailing Address: 10190 Munro Road
Williamsburg, Michigan 48690

Owner: Mr. Christopher Hubbell
Operator: Mr. Christopher Hubbell

Certified Storm Water Operator: Ms. Mindy D. Walters

Certification Number: I-06781 Exp. 7/01/08

Standard Industrial Classification (SIC) Code: 2035 (primary), 0723 (secondary)

Permit Information:
Type: (X) General ( ) Individual
Designated Name: Storm water for industrial activity in cycle-year 5 watersheds
Permit Number: MIS519000
Effective Date of Coverage: April 1, 2000
Number of Storm Water Outfalls: **None**
Receiving Waters: Tobego Creek- Through sheet flow only

Emergency Contact:
Name: Christopher Hubbell
Telephone: 231.264.5260

GENERAL FACILITY INFORMATION

Name of Facility: Williamsburg Receiving and Storage, LLC.
Facility Address: 10190 Munro Road
Williamsburg, Michigan 48690

Facility Contact:
Name: Mr. Christopher Hubbell
Title: President
Telephone: 231.264.5260
Mailing Address: 10190 Munro Road
Williamsburg, Michigan 48690

Owner: Mr. Christopher Hubbell
Operator: Mr. Christopher Hubbell

Certified Storm Water Operator: Ms. Mindy D. Walters

Certification Number: I-06781 Exp. 7/01/08

Standard Industrial Classification (SIC) Code: 2035 (primary), 0723 (secondary)

Permit Information:
Type: (X) General ( ) Individual
Designated Name: Storm water for industrial activity in cycle-year 5 watersheds
Permit Number: MIS519000
Effective Date of Coverage: April 1, 2000
Number of Storm Water Outfalls: One (1) – Munro Road
Receiving Waters: Tobego Creek

Emergency Contact:
Name: Christopher Hubbell
Telephone: 231.264.5260

Storm Water Pollution Prevention Plan
Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Willamsburg, MI 48690

1.0 OVERVIEW

1.1 Introduction

This storm water pollution prevention plan (SWPPP) covers the present and proposed operations at the Williamsburg Receiving and Storage, LLC. (WRS) located at 10190 Munro Road in Williamsburg, Michigan. This plan has been developed as required under part 1.B of Michigan's National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges and in accordance with good engineering practices. This SWPPP describes the facility, current and proposed operations, identifies potential sources of storm water pollution, recommends appropriate best management practices (BMPs) or pollution control measures to reduce the discharge of pollutants in storm water runoff, and provides for periodic review of this SWPPP.

This SWPPP becomes effective as of November 15, 2002. The non-structural controls will be implemented by November 15, 2002. Structural controls will be in place by November 15, 2002.

1.2 Objectives

The goal of the storm water permit is to improve the quality of surface waters by reducing the amount of pollutants potentially contained in the storm water runoff being discharged. Industrial facilities subject to an NPDES permit must prepare and implement an SWPPP for their facility.

The objective of this SWPPP is three (3) – fold:

1. Identifying potential sources of pollution at Williamsburg Receiving and Storage
2. To describe best management practices (BMPs) which are to be used at WRS.
3. To provide other elements such as, but not limited to, a facility inspection program, site compliance evaluation program, record keeping and reporting program which will help wRS comply with the terms and conditions of their storm water permit.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for developing, implementing, maintaining and revising the SWPPP. The members of the team are familiar with management and operations of WRS.

The members of the team and their primary responsibilities (i.e. implementing, maintaining, record keeping, submitting reports, conducting inspections, employee training, conducting the annual compliance evaluation, testing for non-storm water discharges, signing the required certifications) are as follows:

Name	Title, Company	Responsibility
Mr. Christopher Hubbell	President, WRS	WRS Management, signing of required certification
Mr. Richard Banwell	VP Operations, WRS	WRS Management, employee training, submitting reports
Mr. Greg Bratschi	Maintenance, WRS	Inspections and revisions, daily basis
Ms. Mindy D. Walters, PE	Project Manager, Inland Seas Engineering, Inc. (ISE)	Certified Storm water Operator, Annual compliance evaluation, testing for non-storm water discharges
Mr. Brad Link, PE	Project Manager, ISE	Design of Structural Modifications

3.0 POTENTIAL SOURCES OF POLLUTANTS

3.1 Site Maps

Included in Attachment A are several maps that indicate the feature present at the site. The following is a listing of enclosed maps:

Figure 1: Site Location Map
Figure 2: Site Features Diagram- General Vicinity

- Property boundaries
- Buildings and other permanent structures
- Storm water discharge inlets / outfalls
- Location of NPDES permitted discharges other than storm water
- Areas of exposed and/or erodible soils
- Impervious surfaces

3.2 Inventory of Exposed Materials

The permit requires a general inventory of significant materials on site. For each significant material on site an evaluation is to be conducted to determine the potential for these materials to be contributed to the runoff being discharged from the facility. Areas to focus on may include:

- loading and unloading areas
- other material handling operations (fuel pumps, etc.)
- outdoor storage area
- processes which generate dust or particulate matter
- roof vents, stacks, and blowers
- waste generating areas
- waste disposal practices
- maintenance and cleaning practices for vehicles and equipment
- sites of environmental contamination
- areas where spills of polluting materials (salt and any material listed on Michigan's Critical Materials Register) have occurred in the past three years
- any other areas deemed appropriate

Identify ways in which these materials might be exposed to the storm water runoff. And identify the outfalls from which the materials may be discharged if a release should occur.

Area/ Process	Material	Method of Exposure	Outfall
Area 3/4- Brine Pits	Brine	Storm water on raw /or intermediate materials	**Sheet flow, no current outfalls**
Area 1- Factory	Finished Products	Spill at Loading Dock	**Sheet flow, no current outfalls**
Area 1- Factory	Fresh Cherries, Intermediate Products	Storm event during unloading	**Sheet flow, no current outfalls**

3.0 POTENTIAL SOURCES OF POLLUTANTS

3.1 Site Maps

Included in Attachment A are several maps that indicate the feature present at the site. The following is a listing of enclosed maps:

Figure 1: Site Location Map
Figure 2: Site Features Diagram- General Vicinity

- Property boundaries
- Buildings and other permanent structures
- Storm water discharge inlets / outfalls
- Location of NPDES permitted discharges other than storm water
- Areas of exposed and/or erodible soils
- Impervious surfaces

3.2 Inventory of Exposed Materials

The permit requires a general inventory of significant materials on site. For each significant material on site an evaluation is to be conducted to determine the potential for these materials to be contributed to the runoff being discharged from the facility. Areas to focus on may include:

- loading and unloading areas
- other material handling operations (fuel pumps, etc.)
- outdoor storage area
- processes which generate dust or particulate matter
- roof vents, stacks, and blowers
- waste generating areas
- waste disposal practices
- maintenance and cleaning practices for vehicles and equipment
- sites of environmental contamination
- areas where spills of polluting materials (salt and any material listed on Michigan's Critical Materials Register) have occurred in the past three years
- any other areas deemed appropriate

Identify ways in which these materials might be exposed to the storm water runoff. And identify the outfalls from which the materials may be discharged if a release should occur.

Area/ Process	Material	Method of Exposure	Outfall
Area 3/4- Brine Pits	Brine	Storm water on raw /or intermediate materials	Munro Road Ditch
Area 1- Factory	Finished Products	Spill at Loading Dock	Munro Road Ditch
Area 1- Factory	Fresh Cherries,	Storm event during	Munro Road Drain

	Intermediate Products	unloading	

3.3 List of Past Spills and Leaks

The permit requires a listing of oil and other polluting materials that have been spilled or leaked over the three (3) years prior to completion of the plan be included in the plan. Also include the date, volume of materials, the exact location of each release, and the actions taken to clean up the materials and/or prevent exposure of the materials to storm water runoff or contamination of surface waters of the state. (If there have been no spills of pollution materials, state that in this section.)

A list of past spills to be known to have occurred at the site is included as Table 1.

3.4 Summary of Sampling Data

Not all facilities will have sampling data available. If there is data available for your facility it is to be included in the SWPPP. If there is no data available, please state that in this section.

The following is a summary of sampling data available for Williamsburg Receiving and Storage LLC.

Date	Location	Parameter	Range	Sampled by	Analyst	Changes
10/31/02	Munro Rd.	BOD	<200 mg/L	TJG	KMC	NA
10/31/02	Munro Rd.	Chloride	3 mg/L	TJG	KMC	NA
10/31/02	Munro Rd.	Phosphorus	<0.25 mg/L	TJG	KMC	NA
10/31/02	Munro Rd.	Sodium	3.05 mg/L	TJG	KJ	NA

Legend:
TJG= Tim Gates (ISE)
KMC= Kelly Crockett (SOS Analytical Lab)
KJ= Kelly Jaquish (SOS Analytical Lab)
NA= Not Applicable

4.0 BEST MANAGEMENT PRACTICES

Storm water management controls, or best management practices (BMPs), will be implemented to reduce the amount of pollutants in storm water discharged from WRS.

The permit requires that the following categories of BMPs to be considered, and selected where applicable.

4.1 Non-Structural Controls

Non-structural controls are practices that are specifically intended to reduce the amount of pollution getting into surface waters. There are generally implemented to address the

problem at the source. They do not require any structural changes to the facility. The following non-structural controls have been selected for implementation:

- **Preventative Maintenance**

  Preventative Maintenance involves the regular inspection, testing, and cleaning of facility equipment and operational systems. These inspections will help to uncover conditions which might lead to a release of materials. Thus, allowing for maintenance to prevent such a release.

  The following equipment/activities will be included in the preventative maintenance program. (Examples: fuel pumps, storage tanks for waste fluid, all structural controls, etc.)

  The following equipment/activities will be included in the preventive maintenance program.

Equipment / Activity	Task	Frequency
Visual inspection	Site observations of drive areas for production materials or refuse	Daily
Dry Chemical Storage	Inventory chemicals and determine if there are any that have excessive quantities, observations of storage location(s)	Bi-Weekly
Hi-Lows	Routine Maintenance- Reduction of Possible Leaks	Monthly
Dozer	Routine maintenance- reduction of possible leaks	Semi-Annual
Back Hoe	Routine maintenance- reduction of possible leaks	Semi-Annual
Other Equipment*	Routine maintenance- reduction of possible leaks	Semi-Annual

  * A complete list of equipment owned and/or maintained by Williamsburg Receiving and Storage LLC, is included as Table 2.

- **Semi-Annual Comprehensive Inspections**

  Comprehensive Inspections of the facility (equipment, plant areas, and structural controls) are required by the permit. These inspections must occur at least once every six (6) months. Records of the inspections must be kept on file with the SWPPP.

  The following is a description of out facilities comprehensive inspection schedule.

  Due to the typical schedule of activities at WRS, We have determined that the best time to complete these semi-annual inspections is in April and October.

WRS storm water pollution prevention team has developed a standard operating procedure and inspection form for this inspection. A copy of a draft is included as Appendix A.

- **Good Housekeeping Practices**

  Good housekeeping practices are designed to maintain a clean and orderly work environmental. This will reduce the potential for significant materials to come in contact with storm water.

  The following practices are included in our good housekeeping routine. (Examples: keeping the pump area clean, keeping an accurate inventory, sweeping paved areas and floors, picking up repair facilities, etc.)

  To assist the storm water operator with daily maintenance activities at Williamsburg Receiving and Storage LLC., all workers at the plant are charged with keeping up the plant and surrounding areas in a clean and maintained condition. This includes reporting any spills at the site to the maintenance supervisor, sweeping of paved areas, and general professional appearance of the site.

- **Spill Prevention and Response Procedures**

  Spills and leaks together are the largest industrial source of storm water pollution. Thus, this SWPPP specifies material handling procedures and storage requirements for any significant materials. Equipment and procedures necessary for cleaning up spills and preventing the spilled materials from being discharged have also been identified. All employees have been made aware of the proper procedures.

  A spill prevention and response plan is included as Standard Operating Procedure No. 5.

- **Sedimentation Control Measures**

  There may be certain areas of the facility that are prone to soil erosion. These areas need to be protected, and the soil kept out of the storm water discharge. (if there are no areas prone to soil erosion state that in this section)

  Due to the drastic elevation change between the plant and the surrounding properties to the North and West sedimentation control measures are necessary at the site to limit silt and sediment from traveling to the limits of the site. Therefore, Williamsburg Receiving and Storage LLC. has implemented policies to re-plant exposed soils within a reasonable time following a storm event (wind or precipitation) that exposes site soils.

- **Employee Training**

  Employee training will be a major component in ensuring the success of the facilities SWPPP. The more knowledgeable all employees are about the facility's SWPPP and what is expected of them, the greater the chance that the plan will be successful.

  The following is a description of the employee training programs to be implemented to inform appropriate personnel at all levels of responsibility of the components of the SWPPP.

  WRS has implemented a training program for those who transfer materials outside the confines of the plant as to there responsibilities, including but not limited to good house keeping practices, spill prevention, and spill response.

  WRS has included a list of the topics covered in training sessions and employees included as Standard Operating Procedure No. 7 with documentation under Employee Training.

- **List of Significant Materials Still Present**

  After the implementation of non-structural controls the following significant materials are expected to be present in the storm water discharge. These materials will be addressed through the use of structural controls.

  After implementation of non-structural controls the following materials are expected to still be present in the storm water being discharged from the facility. (if there will be no significant materials present after the implementation of the non-structural controls, state that in this section)

Material	Location	Outfall	Planned Control Measure
Storm water on top of Brine Pit covers	Brine Pits on East side of Property	Munro Road	Storm water to be relocated into re-designated Brine Pits for testing prior to disposal and/or irrigation.

4.2 Structural Controls

Structural control measures will be necessary to control any pollutants that are still present in the storm water after the non-structural controls have been implemented. These types of controls are physical features that control and prevent storm water pollution. They can range from preventative measures to collection structures to treatment systems. Structural controls will require construction of a physical barrier. (if no structural controls measures are needed at the facility, state that in this section)

- **Preventative Measures**

  Preventative measures are controls which are intended to prevent exposure of storm water to contaminates.
  The following preventative measures have been chosen for this facility.

  None Applicable

- **Diversions**

  Diversion practices are structures (including grading and paving) that are used to divert storm water away from high risk areas and prevent contaminants from mixing with the runoff, or to channel contaminated storm water to a treatment facility or containment area.

  The following areas are to be protected through the use of diversion structures.

Area	Material	Control Measures
East ramped entrance to the Plant	Storm water / Plant materials	The ramp into the plant on the east side is sloped so that waters within the plant don't leave and storm water doesn't enter the plant
East Side of Plant	Storm Water	Conveyance on the North ½ of the Plant eliminate Storm water from ponding into the building

- **Containment**

  Containment areas are structures designed to hold pollutants or contaminated storm water to prevent it from being discharged to surface waters. These structures can range from drip pans to large containment areas required for Pollution Incident Prevention Plans (PIPP) or Spill Control and Countermeasures (SPCC) plans.

  Containment structures have been installed in the following areas.

Area	Material	Control Measures
Brine Pits	Storm water - Potentially impacted by brine/cherries	Storm water collected on brine pit covers will be monitored to prevent overflowing and pumped into dedicated basins
Brine Distribution Line Connection	Brine and Cherries	Drip Pans placed below all connections
Brine Distribution Line that is beneath the road	Brine and Cherries	The brine transfer line is buried as it crosses the road. Secondary containment was installed on this line, with a sump at the end to assist it determining if a release has occurred.

5.0 NON-STORM WATER DISCHARGES

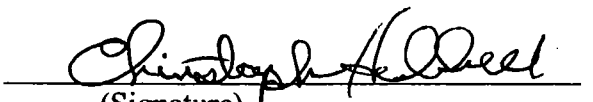
The permit requires that all discharge locations be evaluated for the presence of non-storm water discharges, any unauthorized storm water discharges must be eliminated, or covered under another National Pollutant Discharge Elimination System (NPDES) permit. Certification that there are no unauthorized discharges must be submitted to the appropriate district supervisor. The following is a list of non-storm water discharges authorized under this permit.

> Fire fighting activities, fire hydrant flushing, potable water sources including waterline flushing, irrigation drainage, lawn watering, uncontaminated groundwater, foundation or footing drains, building wash down where no detergents were used, air conditioning condensate, dust control spraying, rinsate water

Date	Outfall	Method	Evaluator	Observations (Are there any non-storm water discharges? Authorized or unauthorized?)	Date Corrected
10/31/02	Munro Rd.	Visual	MDW	No unauthorized discharge detected	

Certification of Evaluation of Non-Storm Water Discharges

I certify under penalty of law that the storm water drainage system in the SWPPP has been tested or evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. To the best of my knowledge and belief, the information submitted is true, accurate and complete, and at the time that this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



(Signature)

11-13-02

(Date)

Mr. Christopher Hubbell

(Printed Name)

President

(Title)

6.0 RECORD KEEPING AND REPORTING

The permit requires that records of all preventative maintenance inspections, the semi-annual comprehensive site inspections, records of employee training sessions, and the annual report be retained at Williamsburg Receiving and Storage LLC. for at least three years after the permit for coverage expires.

These records must be made available, upon request, to a representative of the Michigan Department of Environmental Quality (MDEQ). In the case of the facilities which discharge storm water to a municipal separate sewer system, the records must also be made available to the operator of the municipal system.

6.1 Annual Report

The permit requires that Williamsburg Receiving and Storage LLC. prepare an annual report discussing the effectiveness of the SWPPP. This report should include any changes, any spills that occurred, what actions were taken as a result of the spill, inspection results, and any other information relevant to the SWPPP. The annual report is to be retained on site. It does not need to be submitted to the MDEQ.

6.2 Sample Record Keeping and Reporting Forms

The following forms are available for use, under the blank documents tab.

Significant Spill Report
Non-storm Water Inspection Report
Employee Training
Good Housekeeping
Preventative Maintenance
Storm Water Inspection Report

7.0 CERTIFICATION OF THE SWPPP

I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. In addition, at the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Mindy Walters — (Signature of Certified Operator)

I-06781 — (Certification Number)

Ms. Mindy Walters, PE — (Printed Name)

1-09-03 — (Date)

Christopher Hubbell — (Signature of Corporate Officer)

1-9-03 — (Date)

Mr. Christopher Hubbell — (Printed Name)

President — (Title)

Retain a copy of this certification with the SWPPP and submit a copy with the original signatures to the MDEQ office in your area.

Note: Revisions made to the Storm Water Management Plan in January 2003, include:

1. General Facility Information: Number of storm water outfall changed from one (1) to zero (0).
2. Potential Sources of Pollutants (Page 3)- Outfall changed from Munro Road ditch to Sheetflow only, no outfalls
3. Re-certification by Chris Hubbell and Mindy Walters
4. Note on Figure 2 indicating that the former outfall has been removed.

7.0 CERTIFICATION OF THE SWPPP

I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. In addition, at the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

(Signature of Certified Operator)	I-06781 (Certification Number)
Ms. Mindy Walters, PE (Printed Name)	11/13/02 (Date)
(Signature of Corporate Officer)	11-13-02 (Date)
Mr. Christopher Hubbell (Printed Name)	President (Title)

Retain a copy of this certification with the SWPPP and submit a copy with the original signatures to the MDEQ office in your area.